

BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

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EXECUTIVE SECRETARY

IN RE: CONTESTED CASE)
PROCEEDING TO ESTABLISH FINAL)
COST BASED RATES FOR) DOCKET NO. 97-01262
INTERCONNECTION AND)
UNBUNDLED NETWORK ELEMENTS)
)

CONSUMER ADVOCATE DIVISION'S COMMENTS ON DEAVERAGING PROPOSAL

Pursuant to the April 10, 2000 Notice of the Tennessee Regulatory Authority (TRA), the Consumer Advocate Division respectfully submits its comments for geographic deaveraging of the proxy prices adopted by the Authority in Dockets No. 6-01152 and 96-01271. Comments or proposals on deaveraging rates are to be submitted by April 19, 2000. Pursuant to the Federal Communications Commission (FCC), deaveraged rates must be in place by May 1, 2000.

First, the Consumer Advocate Division finds that the time-frame for filing comments is too short to properly determine what is appropriate for Tennessee. Accordingly, any determination by the TRA on deaveraged rates should be on an interim basis.

Furthermore, in reviewing BellSouth Telecommunications, Inc.'s Deaveraging Proposal, the Consumer Advocate Division would note that the model proposed by BellSouth was not available for examination during the hearings on unbundled network elements. In addition, BellSouth's use of national inputs is inherently suspect because the deaveraged rates should be based on Tennessee specific data. Accordingly, the

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments on Deaveraging Rates has been faxed and or mailed postage prepaid to the parties listed below this 19th day of April, 2000.

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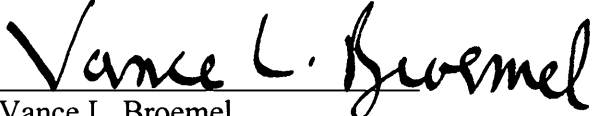
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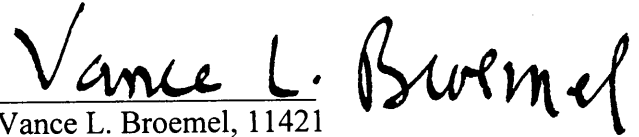
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Consumer Advocate Division objects to these parts of the BellSouth proposal.

Respectfully submitted,



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Consumer Advocate Division

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